

May 13, 2022

VIA ECF

Honorable Jennifer Willis
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: *Columbia University v. Encyclopaedia Iranica Foundation*, 19-cv-7465 (AT) (JW);
Encyclopaedia Iranica Foundation v. Columbia University et al., 19-cv-8562 (AT) (JW)**

Dear Judge Willis:

Encyclopaedia Iranica Foundation (“EIF”), Columbia University (“Columbia”), Elton Daniel, and Koninklijke Brill (“Brill,” and collectively, the “Parties”) respectfully submit this letter to jointly request that the Court extend the discovery deadline in these consolidated actions set in the Court’s September 22, 2021 Order (the “Order”). (ECF 168.)¹ This is the first request for an extension of the discovery schedule set forth in the Order. Currently, as per the Order, all discovery is to be completed no later than June 22, 2022.

Good cause exists to extend the discovery deadline to allow the Parties additional time to complete their document collections and productions. Document discovery in these actions is extremely voluminous, requiring the Parties to collect and review for production a significant volume of emails and hard-copy documents spanning a 40-year time period. While the Parties are working diligently to complete document discovery, they need additional time to complete their productions. Moreover, Brill was brought into these actions as a party through EIF’s First Amended Complaint, filed in December 2021, three months after the Court entered the Order. (ECF 169.) Brill, as a newly added party, requires additional time to collect and produce its documents, some of which are located abroad.

The Parties jointly request that the Court permit them to complete discovery on the following schedule:

- Document discovery: Document production to continue to occur on a rolling basis, with substantial completion of the Parties’ productions by June 17, 2022, and the completion of all document discovery, including the production of privilege logs, by July 15, 2022;
- Written discovery: Interrogatories and Requests for Admission, if any, to be served by August 19, 2022;
- All discovery, including depositions and expert discovery, to be completed by November 18, 2022;

¹ References to the docket numbers in this letter refer to filings in 19-cv-8562 (AT) (JW).

- Any dispositive motion shall be made in accordance with Judge Torres's Individual Rules of Practice.

The Parties submit a proposed amended scheduling order herewith reflecting their proposed schedule. The Parties are available to discuss this application or any other issues at the Court's convenience. We thank the Court for its attention to this matter.

Respectfully submitted,

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cc: All counsel of record (via ECF)